

Atty. Docket No. POU920010173US1

Serial No. 10/043,489

**REMARKS**Amendments to the Specification

Applicants have amended typos in paragraphs [0031] and [0032] of the present specification.

Rejection of the Claims

The examiner rejected the presently pending claims under 35 U.S.C. §103 (a) over U.S. Patent No. 6,327,621 to Lee et al. ("Lee") in view of U.S. Patent No. 6,046,989 to Takahashi in further view of U.S. Patent No. 6,957,276 to Bahl ("Bahl").

**The Lee patent**

There are fundamental differences between Lee and the presently claimed invention. First, Lee doesn't teach assigning an address at all. All the addresses in the Lee patent are pre-assigned and are not obtained from a fabric in response to an assignment request as in the presently claimed invention.

Claim 1 recites, in part:

the table of active addresses containing addresses generated and assigned to partitions by the fabric in response to address assignment requests from the partitions;

Claim 9 recites, in part:

the table of active addresses containing addresses generated and assigned to partitions by the fabric in response to address assignment requests from the partitions;

Claim 12 recites, in part:

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wherein each partition has an address that was assigned to it by the fabric in response to the partition's request for an address assignment;

Claim 20 recites, in part:

the table of active addresses containing addresses generated and assigned to partitions by the fabric in response to address assignment requests from the partitions

What happens in the Lee patent is that a new control command containing the IP multicast address is sent to the device driver (col 6, lines 11-15). The platform receiving the packet (i.e. the platform containing the device driver) then registers the address with the LAN adapter and the address is added to routing tables. This address is not assigned by the LAN or any fabric, it is merely received by the LAN adapter and stored.

Col. 6. lines 23-27 of Lee describe that the Multicast table is stored in the host adapter and the commands are sent between the host and host adapter. Specifically, Lee states:

This command will cause the IP MAC Multicast Address to be removed from the LAN adapters registration and the IP Multicast address to be removed from the Multicast table.

col 6. lines 36-39

The LAN adapter and the Multicast table are both located in Lee's Host and are not in the LAN, which LAN corresponds to the present invention's fabric, according to the examiner's citation of Lee, at col. 3 line 59 through col. 4 line 14.

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## The Bahl patent

The examiner stated:

The examiner has not identified any motivation to combine Bahl with Lee and Takahashi. Thus, the examiner has not established a prima facie case of obviousness sufficient to reject the present claims under 35 U.S.C. §103 (a).

Bahl addresses an extension of a complex protocol, i.e. DHCP, that is different from the TCP/IP protocol implemented in Lee and Takahashi. See col. 2, lines 24-56. In fact, nowhere does Bahl mention multicast communications. The DHCP protocol is typically implemented for individual addresses (or point-to-point communications) and not for the multicasting environment of Lee.

Another reason that Bahl is incompatible with Lee and Takahashi is that Bahl requires a third party (e.g. network administrator) to manage the claimed method of removing an assigned address from a table. See col. 10, lines 44-45. DHCP does not provide a method for an adapter to remove its own address, or request its address to be removed from a table without administrator intervention. Therefore, the technology described in Bahl cannot be combined with the environment described in Lee or Takahashi.

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Hence, all the presently pending independent claims, and claims depending therefrom, recite fundamental differences between the present invention and Lee, Takahashi, and Bahl.

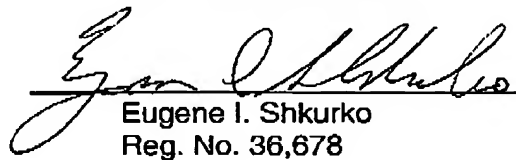
### CONCLUSION

Applicants have properly accommodated each of the examiner's grounds for rejection, as explained above. Applicant submits that the present application is now in condition for allowance.

If the Examiner has any questions or believes further discussion will aid examination and advance prosecution of the application, a telephone call to the undersigned is invited.

Respectfully submitted,

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